<u>REMARKS</u>

Claims 1-39, 50 and 51 are pending in the present application (claims 4-7, 10-17, 23-26, 29-33, 35-39, and 50 are withdrawn from consideration). Further, Applicants note that claims 19-22, 27, and 28 have been identified as allowable, and thank the Examiner.

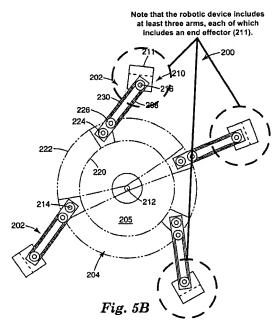
The claims have not been amended. They are reproduced herein as a courtesy to the Examiner.

Rejections Under 35 U.S.C. §102(b)

Claims 1-3, 8, 9, 18, and 34 are presently rejected under 35 U.S.C. §102(a), as being anticipated by U.S. Patent No. 6,105,455 (Rosheim). Applicant respectfully traverses this rejection.

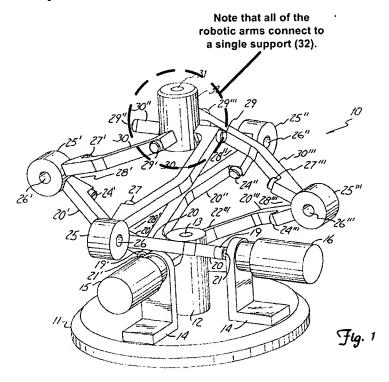
At the outset, Applicant notes that the aforementioned claims are patentable over Rosheim for many reasons. However, for the sake of simplicity, Applicant focuses upon a single such reason herein. Applicant reserves the right to advance other reasons in the future.

Independent claim 1 and its dependent claims each recite a continuous motion robotic device having at least three robotic arms, each of which includes an "end effector." As explained in the application at page 6, lines 4-5, an end effector is a device "configured to perform work on an object." An examplary embodiment of such a robotic device is presented in Figure 5B of the application, which is reproduced below.



Turning to Rosheim, the robotic device disclosed therein includes four robotic arms. Each of the four robotic arms connects to a single support, upon which an end effector may be mounted. The robotic device is designed so that the four arms cooperate for the purpose of permitting the support (and therefore the end effector connected thereto) to arrive at any position within a hemispheric surface (see Rosheim at col. 1, lines 40-45).

Notably, the Rosheim device includes <u>one</u> support (and therefore one end effector) coupled to <u>all four</u> arms. That this is the case can be verified by inspection of Figure 1 of Rosheim, presented below.



The rejected claims, however, recite a device having at least three arms, <u>each</u> of which includes an end effector. As can be seen, Rosheim does not teach a device having at least three arms, each of which includes an end effector (it teaches a device with four arms that <u>share</u> a single end effector). Therefore, the rejection of the claims as being anticipated by Rosheim is improper.

Applicant further points out that in order to modify the Rosheim device to satisfy the aforementioned limitation, the various arms of the device would have to be decoupled

from the support, and end effectors would have to be coupled to at least three of the arms. There can be no motivation to modify Rosheim in such a manner, because such a modification would frustrate the purpose of the Rosheim device, i.e., the various end effectors of such a modified Rosheim device would not be able to arrive at any position within a hemispheric surface. ("If a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." MPEP §2143.01.) Thus, as a matter of law, claim 1 and its dependent claims cannot be viewed as being obvious in view of Rosheim.

For the foregoing reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-3, 8, 9, 18, and 34. Applicants further point out that in the previous Office Action, claim 51 was neither rejected, nor objected to, nor allowed. Applicants respectfully urge allowance of claim 51 for the foregoing reasons.

Summary

The remarks set forth above make certain arguments in support of the patentability of the pending claims. Applicants respectfully note that there may be other reasons that the pending claims are patentably distincty over the cited references, and Applicants reserve the right to raise any such reason or argument in the future.

Respectfully submitted,

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